

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

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| Ricardo Medina Medina | CIVIL NO. 17-01017 (CCC) |
| Plaintiff, | WAGES; VACATION LEAVE |
| v. | PAYOUT; BREACH OF CONTRACT; |
| HCL-America, Inc., a foreign corporation, | WRONGFUL TERMINATION; LIBEL |
| Defendant. | |

REPORT OF PARTIES' RULE 26(f) MEETING

TO THE HONORABLE COURT:

COME NOW Plaintiff Ricardo Medina Medina ("Plaintiff") and Defendant HCL-America, Inc. ("Defendant"), through their respective undersigned counsel, and respectfully inform the Court as follows:

1. The Parties agreed to exchange their respective initial disclosures, as required by Rule 26(a)(1), by May 30th, 2017.

2. The Parties have further agreed to the following discovery plan:

a. to serve any set of written discovery in the form interrogatories, requests for admissions, and/or requests for production of documents on each other by June 9th, 2017. No set of written interrogatories shall exceed twenty-five (25)

questions. Each party will have through July 21, 2017 to object and/or respond to the other party's written discovery requests. Any extensions of time, if necessary, will be coordinated between the Parties and subject to the deadlines established in the Case Management Order.

b. The taking of any depositions has been tentatively scheduled for August 9th and 10th and from August 14th through August 17th, 2017. At this time, Plaintiff intends to depose Levett Washington, Shafaquat Ameez and Rolando Merino. At this time, Defendant intends to depose Plaintiff, but reserves its right to add further deponents.

c. At this time, the Parties do not expect to use any expert witnesses, but hereby reserve their right to do so in accordance with and subject to the Case Management Order.

d. Any request for discovery of Electronically Stored Information (ESI) shall not be made separately, but rather included in the requesting party's interrogatories and/or requests for production of documents, as appropriate. The Parties acknowledge, understand and hereby reaffirm their duty to preserve ESI.

5. The Parties will endeavor to complete the above discovery plan by the discovery cut-off date of October 6th, 2017. However, if there is a reasonable need to modify the

discovery schedule proposed above, the Parties will jointly and timely inform the Court of the circumstances warranting the modification and make a formal request for an extension of time to complete discovery.

WHEREFORE, the Parties respectfully request that this Honorable Court takes notice of the above.

Respectfully submitted.

In San Juan, Puerto Rico, this 25th day of May, 2017.

We HEREBY CERTIFY that on May 25th, 2017, we electronically filed the foregoing with the Clerk of the Court using the CM/ECF system. Notice of this filing will be sent to the following parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

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